



**MITT ROMNEY** 

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## DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

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January 30, 2006

Michael Smith Director of Operations Western Massachusetts Electric Company One Federal Street, Bldg. 111-4 Springfield, MA 01105

**Re:** Electric Distribution System Safety Plans

Dear Mr. Smith:

On December 9, 2005, the Department of Telecommunications and Energy ("Department") distributed the following two reports relating to the safety of electric distribution systems in Massachusetts: (1) the Independent Assessment of Stray Voltage in Underground Distribution Systems of Massachusetts Electric Companies ("Stray Voltage Final Report") as prepared by Navigant Consulting, Inc., and (2) the Independent Assessment of Dislodged Manhole Covers ("Manhole Safety Final Report") as prepared by Siemens Power Transmission & Distribution, Inc. ("Siemens"). With the issuance of these reports, the Department required each of the Massachusetts electric distribution companies, including Western Massachusetts Electric Company ("WMECo"), to file plans to implement the recommendations contained in each report. WMECo filed its implementation plan with the Department on January 10, 2006 ("WMECo Plan").

The Department has reviewed the WMECo Plan to implement procedures pertaining to the detection and mitigation of stray voltage and to the inspection and operation of manholes, and we find that the WMECo Plan is in substantial compliance with the recommendations contained in the Stray Voltage Final Report and the Manhole Safety Final Report. Accordingly, the Department approves the WMECo Plan with the following modifications. The WMECo Plan indicates that the Company will survey its distribution system to identify

Michael Smith Page 2

Western Massachusetts Electric Company Electric Distribution System Safety Plans January 30, 2006

locations of metallic risers, sweeps, and conduits susceptible to stray voltage and will not begin stray voltage testing of that equipment in the near future. WMECo is directed to commence stray voltage testing of all equipment as soon as practicable, but no later than March 1, 2006. WMECo's stray voltage testing schedule shall include testing when equipment is most susceptible to stray voltage.

The Manhole Safety Final Report included a recommendation that each company maintain a database of new and repair splices made by employees and contractor crews in order to determine possible workmanship issues and related splicing training needs. Siemens provided a listing of information that should be captured in the splicing log at Appendix B.2. Beginning no later than June 1, 2006, WMECo is directed to keep a splicing log on all new and repair splices containing the information recommended by the Manhole Safety Final Report. The companies may develop, through the Working Group (see below), an alternative proposal that allows the identification of workmanship-related trends. The Department will review any alternative proposed by the Working Group, and may modify this requirement as appropriate.

Consistent with the recommendations in the Stray Voltage Final Report and the Manhole Safety Final Report, the Department directs WMECo to participate with the other Massachusetts electric distribution companies in a working group ("Working Group") to address issues regarding electric distribution system safety, the development of a uniform approach to electric distribution system safety plans, and such other issues of importance including, but not limited to: the development of protective equipment for use on secondary systems, manhole event trends, root cause analyses, research studies, results of pilot programs, new technologies, and lessons learned. In addition, the Working Group shall address the use of the ORP or other standardized protocol for reporting manhole events and stray voltage incidents to the Department. The Working Group shall meet quarterly, and report quarterly to the Department. Staff from the Department's Electric Power Division may participate in the Working Group.

WMECo shall implement its Plan immediately. In order to allow for the Department's continued review of the WMECo Plan, by June 1, 2006, and every three months thereafter, WMECo shall file with the Department's Electric Power Division a written report on its progress in implementing the WMECo Plan, including a summary of all stray voltage incidents and manhole events in the current quarter and year to date. Upon review of WMECo's implementation of its Plan, the Department may direct modifications to the WMECo Plan as necessary.

Page 3

Michael Smith Western Massachusetts Electric Company Electric Distribution System Safety Plans January 30, 2006

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cc: Mary L. Cottrell, Secretary
Andrew O. Kaplan, General Counsel
Timothy Shevlin, Executive Director
Ronald LeComte, Director, Electric Power Division
John Cope-Flanagan, Assistant General Counsel
Joan Foster Evans, Senior Counsel